July 21, 2006

Kevin Kouba Area Manager Otter Tail Power Company 404 South Second Street P.O. Box 392 Milbank, South Dakota 57252-0392

RE: Docket CE06-001 In The Matter Of The Complaint Filed By Gene Drong, Colman, South Dakota, Against Otter Tail Power Company Regarding The Provision Of Service A Proposed Development South Of Egan South Dakota.

Dear Mr. Kouba:

Following are questions by Commission Staff regarding the above mentioned matter.

- Please provide a detailed description of Otter Tail's procedure and system used to determine the estimated costs of line extensions. Provide a detailed listing of the expenses included in your estimate of providing service to Mr. Drong and the corresponding dollar amounts.
- 2. Provide a detailed description of the four year provision included in Otter Tail's line extension proposal to Mr. Drong. Explain in detail and quantify the margins that this provision will provide for recovery of Mr. Drong's line extension costs.
- 3. Identify the section(s) from its South Dakota tariff that Otter Tail is following regarding the offer made to Mr. Drong concerning the proposed line extension.
- 4. Provide a map to scale (4" to the mile or similar) showing the location of the proposed line extension including its origination from existing Otter Tail facilities to the location Mr. Drong's new residence. Please show the location of potential additional customers as discussed in your correspondence with Mr. Drong.

If you have any question regarding the above, please contact me at the Commission.

Sincerely,

Dave Jacobson



Otter Tail Power Company

Otter 1	an rower Company				
Docket Number: CE06-001	Date of Request: July 18, 2006				
Requested From: Kevin Kouba	Response Due: August 2, 2006				
Requesting Information: David Jacobson, SDPUC Type of Inquiry: Customer Complaint/Revenue Guarantee					
Response to Information Request No. 1 (via email)					
RE: Complaint Filed By Gene Drong					
1. Please provide a detailed description of Otter Tail's procedure and system used to determine the estimated costs of line extensions. Provide a detailed listing of the expenses included in your estimate of providing service to Mr. Drong and the corresponding dollar amounts.					

The attached document, Exhibit 1, is the actual work order estimate that was put together in order to determine the cost to serve the proposed Gene Drong residence.

When we receive requests such as this, our normal procedure is to travel to the proposed site and physically review the request. It is a very important step for us in order to accurately understand and project to estimated amount of work required as well as the cost. Once we have determined what it will take to do the job, a work order is created. Typically, an engineer or Operations Manager will handle putting the work order together, as they are usually the ones who have surveyed the job site. Our work order estimating, which we have used for many years and has served us quite well, allows us to provide a very accurate estimate as to the cost of the project. Some of the basic inputs into the development of an estimate would include number of man-hours required to complete the job, material needed based on our construction standards, other costs such as meals and lodging, etc. The face sheet of the work order estimate summarizes the costs and the subsequent pages provide more detail.

Response by: Kevin Kouba '	List Sources of information:
Title: Area Manager	If any, listed in footnotes
Department: Milbank	
Telephone: 605-432-4579	

Otter Tail Power Company

Docket Number: CE06-001 Date of	Request: July 18, 2006
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and Kevin Kouba	acabaan CDDIIC
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Type or main.	
Response to Information Request No. 2 (via	email)
RE: Complaint Filed By Gene Drong	
2. Provide a detailed description of the four-ye extension proposal to Mr. Drong. Explain in de provision will provide for recovery of Mr. Dro	etail and quantify the margins that this
Otter Tail will respond to this request in 6 presponse. We believe it is best to start with Extension Policy, discuss the initial and reand finally provide support for the proposal	h an explanation of Otter Tail's vise proposals provided to Mr. Drong,
 a) Otter Tail's Extension Policy b) Context of the proposed Extension c) Explanation of initial rough extension d) Estimate of electric revenue for the e) Explanation of revised extension es f) Details of the proposed extension a 	on estimate to Mr. Drong proposed residence stimate to Mr. Drong
Response by: Kevin Kouba, Area Manager (pa	arts c, d and e)
David Prazak, Supervisor, Pricing (parts a, b a	
Title: (see above)	
Department: Milbank / Regulatory Service	25
Telephone: <u>605-432-4579 – 218-739-8595</u>	

Otter Tail Power Company

Docket Number: CE06-001

Date of Request: July 18, 2006

Requested From: David G. Prazak

Response Due: August 2, 2006

and Kevin Kouba

Requesting Information:

David Jacobson, SDPUC

Type of Inquiry:

Customer Complaint/Revenue Guarantee

a) Otter Tail's Extension Policy

In summary, Otter Tail has offered Mr. Drong an extension proposal consistent with its <u>General Rules and Regulations</u>, <u>Section No. 5</u>, <u>Volume I</u>, <u>4th Revised Sheet No. 99.9</u>. A copy of the Extension of Service, item 6, is shown below.

EXTENSION OF SERVICE: The Company will, at its own expense, extend its facilities for supplying electric service when the anticipated revenue from the sale of additional service justifies the expenditure. If it appears to the Company that the expenditure may not be justified, the Company may require the customer to sign a contract guaranteeing a certain minimum amount of revenue over the first three years use of electric service, or such other initial period of service as may be determined by the Company, and to make an advance payment, as determined by the Company, to guarantee payment of this minimum amount of revenue.

If the customer uses the specified minimum of electric service by the end of the said initial period of service, the advance will be refunded to him. However, if the customer uses less than the minimum, the amount of the deficiency will be billed to the customer, or will be deducted from the deposit, and the balance of the deposit, if any, will be refunded to the customer.

Otter Tail further describes its Extension of Service in its <u>Facilities Extension Policy</u>, contained in the Company's General Office Policy Manual. Below is an excerpt from the policy;

The goal of the policy is to guarantee the Company a minimum amount of revenue over the first three years of use of electric service. The revenue is guaranteed by establishing a Facility Extension Charge (FEC) to be set up. Not all facility extensions require a FEC. In order to determine whether or not an

Response by: Kevin Kouba, Area Manager (parts c, d and e)					
David Prazak, Supervisor, Pricing (parts a, b and f)	List Sources of information:				
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Otter Tail Power Company

Docket Number: CE06-001

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a) Otter Tail's Extension Policy - continued

extension requires a FEC, use the following criteria: If the expected revenue over the first three years of the facility will not equal or exceed the amount of the investment, a FEC shall be used.

The following formula is the basis for determining the Facility Extension Charge (FEC):

Standard Account

FEC = \$(A - B) / 36 months plus an optional development period of 0-12 mo.

A = Work order estimate or estimated investment

B = Deposit

b) Context of the proposed Extension versus average customers:

The proposed extension for Mr. Drong is unique – both in extension costs and the potential revenue from the proposed residence(s) (discussed further in item d, below). Because of the uniqueness of this situation, Otter Tail would like to provide context regarding this extension to the South Dakota PUC and Staff. Below, we provide information on how this proposed extension compares to average customers.

Based on average usage and revenue for our South Dakota residential customers, extensions that would not require a Facility Extension Charge or FEC (described above) would not exceed about \$2700, providing annual revenue of about \$900. This is based on a justified extension of 3 times the annual revenue.

As further described in item e below, the proposed extension costs are \$39,000, with a range of estimated annual revenues, made by Otter Tail, of \$1,500 –

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David Prazak, Supervisor, Pricing (parts a, b and f)	List Sources of information:
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Otter Tail Power Company

Docket Number: CE06-001 Date of Request: July 18, 2006

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and Kevin Kouba

Requesting Information: David Jacobson, SDPUC

Type of Inquiry: Customer Complaint/Revenue Guarantee

b) Context of the proposed Extension versus average customers: continued

\$7600 per year. The range of revenue estimates is uncertain. This unique extension is over 14 times greater than the average residential customer. Even though this extension is unique - Otter Tail is willing to work with customers in these unique situations, as we believe we have done – and further discussed below.

c) Explanation of initial rough extension estimate to Mr. Drong:

Initially, and based on an extremely rough estimate and before a site visit was done, we had proposed to Mr. Drong an estimate of \$36,000 with a deposit of \$18,000 and a minimum monthly billing of \$500 per month for three years

d) Estimate of electric revenue for the proposed residence:

At the time we did this rough estimate, we contacted our Marketing Department to put together an estimate of projected usage numbers. Mr. Drong told us that the house would be approximately 12,000 square feet. We then estimated that the home would use 120,000 kWh for heat per year.

Based on the annual heating kWh estimate, utilizing the Residential Service tariff and using an electric furnace, this would equate to \$6,144 per year. With ground source heat pump technology, the cost would be \$2,048 per year. With air source system, the cost would be \$4,096 per year. General electric usage (lights, etc.) would be an additional \$1,500.00 per year on the above estimates.

Response by: Kevin Kouba, Area Manager (parts c, d and e)					
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Otter Tail Power Company

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d) Estimate of electric revenue for the proposed residence – continued

We had very little information regarding expected load from the home. At one point, Mr. Drong indicated that he would be heating with propane. Based on this. his usage would be significantly less than required to recover the cost of the extension (I.e., see the reference to \$1500 for non-heating use above). We later learned, from other sources, that he would not be heating with propane but rather with some form of heat pump system. Steve Wegman referred me to Chris Bartmann of Beck and Hofer. Mr. Bartmann indicated that the home heating fuel source would not be with propane but rather with geo-thermal or air-source heat pumps. Assuming the customer installs air-source heat pumps, his total yearly energy cost would be somewhere in the neighborhood of \$5,600 per year, or an average monthly billing of \$467. With Ground-source heat pumps, his average billing would be roughly \$300.

e) Explanation of revised extension estimate to Mr. Drong:

In subsequent conversations with Mr. Drong, he indicated that he was not willing to pay any more than what the rural electric company would charge, which was guoted at \$1.80 per foot plus a \$500 transformer charge. We also learned of his intention to sell other lots in close proximity to where he was proposing to build. At this point, we chose to offer another option to Mr. Drong.

On or about April 27, 2006, I drafted a letter to Mr. Drong in which we proposed an upfront charge of \$12,870.00 (7150 feet X \$1.80 per foot), similar to that which was quoted by the rural electric company. Based on the possibility that other homes may be built on his property, I proposed to allow a four-year

Response by: Kevin Kouba, Area Manager (parts c, d and e)				
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Otter Tail Power Company

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David Jacobson, SDPUC

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Customer Complaint/Revenue Guarantee

e) Explanation of revised extension estimate to Mr. Drong – continued

developmental period, one more year than normal, to recover the extension cost based on the revenue from his home and that of others that would possibly be built. I stated in the letter that "Should the electric revenue from your home and any others constructed in this area meet or exceed \$6,532.50 per year for four years (\$544 per month), no further payment will be necessary." The calculation used to come up with the \$6,532.50 was as follows: Cost of the extension (\$39,000.00) less upfront charge (\$12,870.00) = \$26,130.00 divided by number of years (4) = \$6,532.50.

Our intention would be to monitor the usage of Mr. Drong's home and that of any other home built on a yearly basis. No monthly minimum would be charged to Mr. Drong or any other party building on his property. After four years, should the revenue received in addition to the upfront charge (\$12,870.00) be less than \$39,000, the difference would be assessed to Mr. Drong. If, at the end of the four-year developmental period, the electric revenue plus the upfront charge exceeded the extension estimate of \$39,000, Mr. Drong would receive a refund in the amount of the excess.

f) Details of the proposed extension and potential margins:

Otter Tail is supplying two Exhibits (2a and 2b).

Exhibit 2a shows the extension costs and potential revenues as described in item d. This exhibit shows 2 scenarios of less-than expected revenues and 1 scenario of expected revenues for the given extension costs.

Response by: Kevin Kouba, Area Manager (parts c, d and e)				
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Otter Tail Power Company

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Requested From: David G. Prazak

Response Due: August 2, 2006

and Kevin Kouba

Requesting Information:

David Jacobson, SDPUC

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Customer Complaint/Revenue Guarantee

f) Details of the proposed extension and potential margins - continued

Exhibit 2b shows the extensions costs and potential revenues for the expected revenues and scenarios if other homes were added to this extension. If one or more additional homes are added to this extension, it will reduce the cost to Mr. Drong and improve margins to Otter Tail's other ratepayers.

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Telephone: 605-432-4579 – 218-739-8595					

WO NUMBER

COPIES_____ R.SCHEEL D.VANVOORHIS R.HANSEN

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Ţ	EA 1529100	UNDERGROUN MISC ACC UG CAP INSULATE	19.84	19.84
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1	EA	1547225	ŪĠ	EQUIP	U	GUARD	ΰĠ	U	GUARD	LEAD	${\tt ER}$	1.06	1.06
3	EA	1547254	UG	EQUIP	U	GUARD	UG	U	GUARD	2 OR	2	7.98	23.94
1	$\mathbf{E}\mathbf{A}$	1547350	UG	EQUIP	U	GUARD	UG	U	GUARD	3 IN	X	17.33	17.33
1	$\mathbf{E}\mathbf{A}$	2322150	TRA	ans pai) [/T 1P '	TRAI	1SI	PORMER	PAD	$\mathbf{T}\mathbf{N}$	1201.00	1,201.00

TOTAL

13,343.69

WOE835 ESTIMATED SALVAGE FOR CR# 43625

07/27/06 PAGE 1

QTY UM STK NUM

UNIT COST TOTAL COST

TOTAL

.00

WOE840	FRAMINGS USED	FOR CR# 43625	07/27/06	PAGE 1
FRAMING CODE	INST REM O &	M DESCRIPTION		
DC10R DIS52-9S2 DLR/W DLSTDRIVERP DLSURVEY DPDECA DP355 UC10J15	11900 2 16 8 16 2 26 1300	CONDUCTOR 1/0 ACSR 6/INSULATOR SUSPENSION LABOR SECURE RIGHT OF 1-HR LABOR ST DRIVER 1 HR LABOR SURVEY DIS PRIMARY DEAD-END CLEV POLE WOOD 35 FT CLASS CABLE UG 15KV AL 1/0	15 KV WAY HAUL POLE ACCT TRIBUTION OH L IS AUTOMATIC 5	
ULTC 1024S 232B50C 2346 2354 2765	1200 1 1 25 1 3	LABOR TRENCH, WORK WI FRAMING 1024 PLUS STE TRANS 50 KVA 1PPMT 12 CROSSARM 2 PHASE WIRE CROSSARM DOUBLE 2PW DEAD-END UB XARM 10 F	TH CONTRACTOR EL U-GUARD .47GRDY/7.2-24 S T DIST BDA 2PW	J
232B50C 2346 2354	1	TRANS 50 KVA 1PPMT 12 CROSSARM 2 PHASE WIRE CROSSARM DOUBLE 2PW	.47GRDY/7.2-24 S T DIST BDA 2PW	J

Exhibit 2A Otter Tail Pow		Four -Year Potential Revenue Due to Extension Low-Mid-Expected Revenue Estimates							
			w of Expected Revenue Customer A		of Expected Revenue Customer A		Expected. Revenue Customer.A		
	Cust. Deposit	\$	12,870.00	\$	12,870.00	\$	12,870.00		
Revenue	Yr 1	\$	1,500.00	\$	3,600.00	\$	6,532.50		
	Yr 2	\$	1,500.00	\$	3,600.00	\$	6,532.50		
	Yr 3	\$	1,500.00	\$	3,600.00	\$	6,532.50		
	Yr 4	\$	1,500.00	\$	3,600.00	\$	6,532.50		
4-year Revenu	ue with Deposit	\$	18,870.00	\$	27,270.00	\$	39,000.00		
Otter Tail Estimated Extension Cost			\$39,000		\$39,000		\$39,000		
Estimated Customer Balance Owed to Otter Tail after 4 years			20,130.00	\$	11,730.00	= \$=			

Exhibit 2B							on			
Otter Tail Pow	ver Expected a	nd Addi	d Additional Customer Revenue Estimates							
	·		Expected Revenue	The state of the s	Expected Revenue		Expected. Revenue			
		E	Bustomer A	_Cu	stomer A i-B	Cus	stomer A+B+G=			
	Cust. Deposit	\$	12,870.00	\$	12,870.00	\$	6,600.00			
Revenue	Yr 1	\$	6,532.50	\$	3,600.00	\$	3,600.00			
	Yr 2	\$	6,532.50	\$	7,200.00	\$	7,200.00			
	Yr 3	\$	6,532.50	\$	7,600.00	\$	10,800.00			
	Yr 4	\$	6,532.50	\$	7,730.00	\$	10,800.00			
4-year Reven	ue with Deposit	\$	39,000.00	\$	39,000.00	\$	39,000.00			
Otter Tail Esti	imated Extension Cost		\$39,000		\$39,000		\$39,000			
Estimated Customer Balance Owed to Otter Tail after 4 years			<u>.</u>	\$. -	\$				
Justified Otter Tail's investment is justified with customer(s) revenue and/or contribution Not Justified Otter Tail's investment is not justified with customer(s) revenue and/or contribution										
These estimate-scenarios are based on reasonable estimates, but assembled for illustrative purposes.										

Otter Tail Power Company

Docket Number: CE06-001 Date of	of Request: July 18, 2006								
Requested From: Kevin Kouba Response D	due: August 2, 2006								
Requesting Information: David Jacobson, SDPUC Type of Inquiry: Customer Complaint/Revenue Guarantee									
Response to Information Request No. 3 (via email)									
RE: Complaint Filed By Gene Drong									
3. Identify the section(s) from its South Dakota to offer made to Mr. Drong concerning the proposed									
Please see Data Response 2a.									
	,								
•									
Response by: Kevin Kouba	List Sources of information:								
Title: Area Manager	If any, listed in footnotes								
Department: Milbank									
Telephone: 605-432-4579									

Otter Tail Power Company

Docket Number: CE06-001 Date of Requ	est: July 18, 2006								
Requested From: Kevin Kouba Response Due: Au	igust 2, 2006								
Requesting Information: Type of Inquiry: David Jacobson, SDPUC Customer Complaint/Revenue Guarantee									
Response to Information Request No. 4 (via email)									
RE: Complaint Filed By Gene Drong									
4. Provide a map to scale (4" to the mile or similar) show extension including its origination from existing Otter Ta new residence. Please show the location of potential addicorrespondence with Mr. Drong.	il facilities to the location Mr. Drong's								
Attached as Exhibit 4, is a township print of the development.	area of the proposed								
The proposed development is south of Egan, S proposed development would be in the area earnarked by the circled X) and north of the south	st of Mr. Drong's proposed site								
Response by: Kevin Kouba	List Sources of information:								
Title: Area Manager	If any, listed in footnotes								
Department: Milbank									
Telephone: 605-432-4579									